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Attorneys for Defendant  
 AMERICAN SECURITY INSURANCE  
 COMPANY

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

**MICHELLE T. WAHL, on behalf of  
 herself and all others similarly situated,**

**Plaintiff,**

**v.**

**AMERICAN SECURITY INSURANCE  
 COMPANY; and DOES 1-50, inclusive,**

**Defendants.**

**Case No. C:08-0555-RS**

**CLASS ACTION**

**STIPULATION AND [PROPOSED]  
 ORDER FOR EXPEDITED HEARING  
 AND BRIEFING OF DEFENDANT'S  
 MOTION FOR PROTECTIVE ORDER**

1 The parties, by their undersigned counsel, hereby submit the following stipulation and  
2 [proposed] order for entry by this Court pursuant to Local Rule 7-12:

3 1. On August 5, 2009, this Court entered a Case Management Scheduling Order  
4 (Document 77) providing the parties until October 16, 2009 to complete discovery related to class  
5 certification issues.

6 2. At the Case Management Conference held on August 5, 2009 preceding entry of this  
7 Case Management Scheduling Order, the parties reported to the Court that Plaintiff had served a  
8 Fourth Set of Document Requests and Second Set of Interrogatories on Defendant for the purposes  
9 of class certification. Defendant's counsel indicated to the Court that Defendant intended to object  
10 to Plaintiff's discovery requests and to move for a protective order on August 27, 2009 when  
11 Defendant's responses to those requests were due.

12 3. Because any motion filed on or about August 27, 2009 would not be heard until early  
13 October, 2009 on the normal 35 day motion cycle under Local Rule 7-2(a), just a few days before  
14 the October 16, 2009 class certification discovery deadline, the Court advised the parties that they  
15 were free to submit a motion seeking an expedited hearing on any such motion for protective order if  
16 the parties so desired.

17 4. In that connection, the parties hereby agree to and submit the following stipulation for  
18 an expedited hearing and briefing on Defendant's Motion for Protective Order:

19 1. Plaintiff's Opposition to Defendant's Motion for Protective Order to be filed  
20 by September 4, 2009;

21 2. Defendant's Reply on its Motion for Protective Order to be filed by  
22 September 10, 2009; and

23 3. Hearing on Defendant's Motion for Protective Order at 9:30 a.m. on  
24 September 16, 2009 in Courtroom No. 4, Fifth Floor, San Jose.

1 The Parties respectfully request that the Court enter this Stipulation.

2 Dated: August 26, 2009

3 **AGREED TO BY:**

4 **SPECTER SPECTER EVANS**  
5 **& MANOGUE, P.C.**

6 By: s/Joseph N. Kravec, Jr.  
7 Joseph N. Kravec, Jr.

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28 **ATTORNEYS FOR PLAINTIFF**

**PURSUANT TO STIPULATION, IT IS SO ORDERED:**

Dated: 8/28, 2009

  
Honorable Richard Seeborg

**JORDEN BURT LLP**

By: s/Frank G. Burt via email consent  
Frank G. Burt

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